ATTACHMENT A AGRIUM KNO FACILITY CONTINUOUS RELEASE-EMERGENCY RESPONSE NOTIFICATION SYSTEM REPORT

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Agri	Im A	Hackment TO LOT-	- ENV-077-02	
	N:trigen Aproatio I: GENERAL INFOR		C N	
SECTION	I: GENERAL INFOR	WIATION CR-ERIV	S Number: 44607	
Date of Init	al Release:	Date of In	nitial Call to NRC: 10/23/90	
Type of Rep	ort: Indicate below the type of	f report you are submitting.		
	· · · · · · · · · · · · · · · · · · ·	Anniversary Written Not	ification Written Notification	
Initial Wr	 1	ow-up X of a Change		
	Repo	-		
			ed herein are continuous and stable in	
	te under the definitions in 40 C rrent to the best of my knowle		d that all submitted information is	
accurate and co	Atent to the best of my knowle	•	nt, Plant Manager	
			ne and Position	
용	13/79	me 11.	Acat	
	Date		Signature	
Part A. Faci	<u>lity or Vessel Informat</u>	ion		
Name of Facili	ty or Vessel Alaska Ni	trogen Products LLC		
A CONTROL OF THE PARTY	Kenai Pla			
Person				
in Charge	Name of Person in Charge	M. L. Nugent		
of Facility or Vessel	Position Plant Manager			
G1 V CSSC1	Telephone No. (907) 776-812	21 Alternate T	elephone No. () None	
Facility	G ACL OLG III 1	~	, 77 - 7 - 1 - 2	
Address or Vessel	Street Mile 21 Spur Highwa	ry Coun	ty Kenai Peninsula Borough	
Port of	City Kenai	State	AK Zip Code 99611	
Registration				
Dun and Bradstreet Number for Facility 092876390				
Facility/Vessel	Latitude Deg N <u>60</u>	Min 40 Sec 22	Vessel LORAN Coordinates	
Location	Longitude Deg W 151			
Part B. Population Information				
Choose the range that describes the population density within a one-mile radius of your facility or vessel				
Population Density	(Indicate by placing an "X" in the	he appropriate blank below.)	1	
Density	X 0 - 50 persons	101 - 500 persons 501 - 1000 person	more than 1000 persons	
	J1 - 100 persons	501 - 1000 person		
Sensitive	A 12 B 4	, ·		
Populations		ations or Ecosystems etlands, wildlife preserves, etc.)	Distance and direction from facility	
ınd	(c.g., senous, nospitats, we	mands, whomie preserves, etc.)		
Ecosystems	,			
Within one —Mile Radius—	NONE			

INFORMATION	44607
Part A: Basis for Asserting the Release is Conti For EACH source of a release of a hazardous sub essel, provide the following information on a SE ecessary.	stance or mixture from your facility or
Name of Source: Plant 4 Dearator, F-205	
1. Indicate whether the release from this source is either:	
continuous without interruption X OR	routine, anticipated, intermittent
 Identify the activity(ies) that results in the release from the If malfunction, describe the malfunction and explain why continuous and stable in quantity and rate.* Ammonia production. 	
3. Identify below how you established the pattern of release	and calculated release estimates.
X Past release data Knowledge of the operations and rele	
AP-42 test Best professional j	udgmentOther (explain)

SECTION II:

SOURCE

^{*} Note that unanticipated events, such as spills, pipe ruptures, equipment failures, emergency shutdowns, or accidents, do not qualify for reduced reporting under CERCLA section 103(f)(2). Unanticipated events are not incidental to normal operations and, by definition, are not continuous or anticipated, and are not sufficiently predictable or regular to be considered stable in quantity and rate.

SOURCE

Inside diameter

Gas Exit Velocity

Gas Temperature

0.83

INFORMATION

CR-ERNS Number

44607

Average Velocity ______feet/second

of Surface Water

(continued)				
Name of Source:	Plant #4 Dearator, F-20	5		
for EACH source. Photo AFFECTED MEDIUM. Id affected by the release from wastepile releasing to air an	above, provide the following copy this page if necessary. entify the environmental mediunthis source. If your source relationships	m (i.e., a eases haz se to EA	mation. Please provide a SEPARATE sheet air, surface water, soil, or ground water) that is cardous substances to more than one medium (e.g., a CH medium as a separate source and complete	
O AIR X (stack source is a stack or a If identified source is If identified source is	X or area) If the maground-based area source. a stack, indicate stack height:	edium af	fected is air, please also specify whether the 4 feet or meters; OR II, valves, tank vents, pump seals, fugitive	
· ·	(stream, lake any surface water body, give t		of the water body.	
stream order: • If the release affects	or average flow rate: cr	bic feet/ the lake	in acres and the average depth in meters.	
O SOIL OR GROUNI If the release is on or und	• WATERler ground, indicate the distance	to the c	losest water well.	
	Optional	Inform	ation	
evaluating the risks ass make conservative ass	ociated with the continuous rele sumptions about the appropri	ease. If a ate valu	wever, such information will assist EPA in this information is not provided, EPA will les. Please note that the units specified below are that the units are clearly identified.	
For a stack release information, if av	e to air, provide the following ailable:	•	For a release to surface water, provide the following information, if available:	

feet or meters

unknown feet/second or

meters/seconds 212__degrees Fahrenheit,

-Kelvin, or Celsius

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	SECTION II:	SOURCE INFORMATION	MATION			CR-ERNS Number	Number	
		(continued)	. •			44607	7	
21	t C. Identity an	d Ouantity of Eacl	h Hazardous	Substance or	Mixture Re	art C. Identity and Quantity of Each Hazardous Substance or Mixture Released From Each Source	93.	
le	se provide a SE	lease provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.	EACH sourc	e. Photocopy	this page if n	ecessary.		Γ
	Name of Source:	Plant #4, Dearator, F-205	tor, F-205					
								Г
	ist each hazardous s keporting Requirem	List each hazardous substance released from the source Reporting Requirements for Continuous Releases of Ha	the source idenieases of Hazard	tified above and] ous Substances –	provide the follo A Guide for Fa	List each hazardous substance released from the source identified above and provide the following information. (For an example, see Table 1 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)	kample, see Table 1 of iance.)	
	Name of Hazardous Substance	stance CASRN#	Norms (in lbs. or l Upper Bound	Normal Range (in lbs. or kg per day)* Upper Bound Lower Bound	Number of Releases (per year)	Total Quantity Released in Previous Year (in lbs. er-kg)*	Months of the Release	
	Ammonia	7664-41-7	12	12	365	4,380	Ail	

above and provide the following information. (For an example, see Table 2 of Reporting Substances – A Guide for Facilities and Vessels on Compliance.)	Number Mixture Released Months f Releases in Previous Year of the (per year) (in lbs. or kg) Release
above and provide the following information. (For an example, s Substances – A Gnide for Facilities and Vessels on Compliance.)	Normal Range of Mixture (in lbs. or kg per day)* Upper Lower Bound Bound
e and provide the follov tances – A Gnide for F	Normal Range of Components (in lbs. or kg per day)* Upper Lower Bound Bound
entified abov zardous Subs	Weight <u>Percentage</u>
the source ide	CASRN#
released from Continuous Re	Name of Hazardous Substance Components
ist each mixture released from the source identified Requirements for Continuous Releases of Hazardous	varne of Mixture
	<u> </u>

^{*} Please be sure to include units where appropriate. Also, if the release is a radionuclide, units of curies (CI) are appropriate.

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	INFORMATION	44607
For vess	t A: Basis for Asserting the Release is Contine EACH source of a release of a hazardous subel, provide the following information on a SEI essary.	stance or mixture from your facility or
Na	me of Source: Plant 4 Fat Flasher, H-269	
1.	Indicate whether the release from this source is either:	
	continuous without interruption X OR	routine, anticipated, intermittent
2.	Identify the activity(ies) that results in the release from th If malfunction, describe the malfunction and explain why continuous and stable in quantity and rate.* Ammonia production.	
3.	Identify below how you established the pattern of release a	nd calculated release estimates.
	X Past release data Knowledge of the operations and rele	

Other (explain)

SECTION II:

SOURCE

AP-42 test

Best professional judgment

^{*} Note that unanticipated events, such as spills, pipe ruptures, equipment failures, emergency shutdowns, or accidents, do not qualify for reduced reporting under CERCLA section 103(f)(2). Unanticipated events are not incidental to normal operations and, by definition, are not continuous or anticipated, and are not sufficiently predictable or regular to be considered stable in quantity and rate.

SOURCE

INFORMATION

(continued)

CR-ERNS Number

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Name of Source: Plant 4 Fat Flasher, H-269				
For the source identified above, provide the following information. Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary. AFFECTED MEDIUM. Identify the environmental medium (i.e., air, surface water, soil, or ground water) that is affected by the release from this source. If your source releases hazardous substances to more than one medium (e.g., a wastepile releasing to air and ground water), treat the release to EACH medium as a separate source and complete Section II, Parts A, B, and C, of this format for EACH medium affected.				
 AIR X (stack X or area) If the medium affected is air, please also specify whether the source is a stack or a ground-based area source. If identified source is a stack, indicate stack height: feet or meters; OR If identified source is an area source (e.g., waste pile, landfill, valves, tank vents, pump seals, fugitive emissions), indicate surface area: square feet or square meters. 				
O SURFACE WATER (stream, lake, or other) • If the release affects any surface water body, give the name of the water body.				
 If the release affects a stream, give the stream order or average flow rate, in cubic feet per second. stream order: or average flow rate: cubic feet/second; OR If the release affects a lake, give the surface area of the lake in acres and the average depth in meters. surface area of lake: acres and average depth of lake: meters. 				
O SOIL OR GROUND WATER If the release is on or under ground, indicate the distance to the closest water well.				
Optional Information				
The following information is not required in the final rule; however, such information will assist EPA in evaluating the risks associated with the continuous release. If this information is not provided, EPA will make conservative assumptions about the appropriate values. Please note that the units specified below are suggested units. You may use other units; however, be certain that the units are clearly identified.				

For a stack release to air, provide the following information, if available:
 Inside diameter 1.9 feet or meters
 Gas Exit Velocity unknown feet/second or meters/seconds

For a release to surface water, provide the following information, if available:

Average Velocity _____ feet/second of Surface Water

Gas Temperature <u>200</u> degrees Fahrenheit, -Kelvin, or Celsius

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S	SECTION II. SOU	SOURCE INFORMATION	MATION				CR-ERNS Number	ımber	
	(con	(continued)					44607		
Par	Part C. Identity and Quantity of Each Hazard	antity of Eacl	n Hazardous	Substance o	r Mixture R	lous Substance or Mixture Released From Each Source	Each Source		•
Plea	Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.	4TE sheet for	EACH sourc	e. Photocopy	v this page if	necessary.			
Ž	Name of Source:	Plant 4 Fat Flasher, H-269	iher, H-269						
						,			
	List each hazardous substance released from the source identified above and provide the following information. (For an example, see Table 1 of Reporting Requirements for Continuous Releases of Hazardous Substances – A Guide for Facilities and Vessels on Compliance.)	nce released from r Continuous Rel	the source iden eases of Hazard	tified above and ous Substances	provide the fo - A Guide for I	llowing informatio	n. (For an exam els on Complianc	ple, see Table 1 of e.)	
,	, , , , , , , , , , , , , , , , , , ,	HARONE	Norma (in lbs. or)	Normal Range (in lbs. or kg per day)*	Number of Releases	Total Quantity Released in Previous Year	ntity vious Year Lea)*	Months of	·- · · · · · · · · · · · · · · · · · ·
	Name of Hazardous Substance	CASKIN#	Opper Bound	rower bound	Ther Acar	e cor m		TIC INCIDENCE	
	Ammonia	7664-41-7	17	2	365	4,380	0	All	
	•								

ist each mixture released from the source identified above and provide the following information. (For an example, see Table 2 of Reporting Requirements for Continuous Releases of Hazardous Substances – A Guide for Facilities and Vessels on Compliance, Normal Range of

(in lbs. or kg per day)* Normal Range of Upper Lower Bound Bound Components Percentage Weight CASRN# Components Hazardous Substance Name of Name of Mixture

(in lbs. or kg per day)* Upper Lower Bound Bound

Mixture

Number of Releases (per year)

Months of the Release Mixture Released in Previous Year Total Quantity of (in Ibs. or kg)

N/A

^{*} Please be sure to include units where appropriate. Also, if the release is a radionuclide, units of curies (CI) are appropriate.

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SECTION II:	SOURCE
	INFORMATION

44607

Part A: Basis for Asserting the Release is Continuous and Stable in Quantity and Rate. For EACH source of a release of a hazardous substance or mixture from your facility or vessel, provide the following information on a SEPARATE sheet. Photocopy this page if necessary.

Name of Source: Plant 4 Process Condensate Vent, F-263				
1.	Indicate whether the release from this source is either:			
	continuous without interruption X OR routine, anticipated, intermittent			
2.	Identify the activity(ies) that results in the release from this source (e.g., batch process, filling of a storage tank). If malfunction, describe the malfunction and explain why the release from the malfunction should be considered continuous and stable in quantity and rate.*			
	Ammonia production.			
3.	Identify below how you established the pattern of release and calculated release estimates.			
	Past release data Knowledge of the facility/vessel's X Engineering estimate operations and release history			
	AP-42 testBest professional judgmentOther (explain) Flow Measurement			

^{*} Note that unanticipated events, such as spills, pipe ruptures, equipment failures, emergency shutdowns, or accidents, do not qualify for reduced reporting under CERCLA section 103(f)(2). Unanticipated events are not incidental to normal operations and, by definition, are not continuous or anticipated, and are not sufficiently predictable or regular to be considered stable in quantity and rate.

SOURCE

INFORMATION

(continued)

CR-ERNS Number

44607

Name of	Source:
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Plant 4 Process Condensate Vent, F-263

Part B: Specific Information on the Source

For the source identified above, provide the following information. Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.

AFFECTED MEDIUM. Identify the environmental medium (i.e., air, surface water, soil, or ground water) that is affected by the release from this source. If your source releases hazardous substances to more than one medium (e.g., a wastepile releasing to air and ground water), treat the release to EACH medium as a separate source and complete Section II, Parts A, B, and C, of this format for EACH medium affected.

O AIR X (stack X or area) If the medium affected is air, please also specify whether the source is a stack or a ground-based area source.					
If identified source is a stack, indicate stack height:35 feet or meters; OR					
 If identified source is an area source (e.g., waste pile, landfill, valves, tank vents, pump seals, fugitive emissions), indicate surface area: square feet or square meters. 					
O SURFACE WATER (stream, lake, or other)					
If the release affects any surface water body, give the name of the water body.					
If the release affects a stream, give the stream order or average flow rate, in cubic feet per second.					
stream order: or average flow rate: cubic feet/second; OR					
If the release affects a lake, give the surface area of the lake in acres and the average depth in meters.					
surface area of lake: acres and average depth of lake: meters.					
O SOIL OR GROUND WATER If the release is on or under ground, indicate the distance to the closest water well.					

Optional Information

The following information is not required in the final rule; however, such information will assist EPA in evaluating the risks associated with the continuous release. If this information is not provided, EPA will make conservative assumptions about the appropriate values. Please note that the units specified below are suggested units. You may use other units; however, be certain that the units are clearly identified.

•	For a stack release t	to air, provide	the following
	information, if avai	lable:	
	Inside diameter	.083	feet or meters
	Gas Exit Velocity	unknown	feet/second or
		me	ters/seconds

Gas Temperature

212 degrees Fahrenheit,

-Kelvin, or Celsius

•	For a release to surface water, provide the			
	following information, if available:			
	Average Velocityfeet/second of Surface Water			



SECTION II: SOURCE INFORMATION

CR-ERNS Number
44607

Part A: Basis for Asserting the Release is Continuous and Stable in Quantity and Rate. For EACH source of a release of a hazardous substance or mixture from your facility or vessel, provide the following information on a SEPARATE sheet. Photocopy this page if necessary.

Name of Source: Plant 4 H2 Vent Stack, C-200					
1.	. Indicate whether the release from this source is either:				
	continuous without interruptionOR routine, anticipated, intermittentX				
2.	Identify the activity(ies) that results in the release from this source (e.g., batch process, filling of a storage tank). If malfunction, describe the malfunction and explain why the release from the malfunction should be considered continuous and stable in quantity and rate.*				
	Startup of ammonia plant.				
3.	Identify below how you established the pattern of release and calculated release estimates.				
	Past release data Knowledge of the facility/vessel's X Engineering estimate operations and release history				
	AP-42 test Best professional judgment Other (explain)				

^{*} Note that unanticipated events, such as spills, pipe ruptures, equipment failures, emergency shutdowns, or accidents, do not qualify for reduced reporting under CERCLA section 103(f)(2). Unanticipated events are not incidental to normal operations and, by definition, are not continuous or anticipated, and are not sufficiently predictable or regular to be considered stable in quantity and rate.

SOURCE

INFORMATION

(continued)

Gas Temperature <u>100</u> degrees Fahrenheit,

-Kelvin, or Celsius

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(602000000)		
Name of Source: Plant 4 H2 Vent Stack, C-200		
Part B: Specific Information on the Source For the source identified above, provide the following information. Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary. AFFECTED MEDIUM. Identify the environmental medium (i.e., air, surface water, soil, or ground water) that is affected by the release from this source. If your source releases hazardous substances to more than one medium (e.g., a wastepile releasing to air and ground water), treat the release to EACH medium as a separate source and complete Section II, Parts A, B, and C, of this format for EACH medium affected.		
 AIRX_ (stack X or area) If the medium affected is air, please also specify whether the source is a stack or a ground-based area source. If identified source is a stack, indicate stack height: 80 feet er-meters; OR If identified source is an area source (e.g., waste pile, landfill, valves, tank vents, pump seals, fugitive emissions), indicate surface area: square feet or square meters. 		
SURFACE WATER (stream, lake, or other) If the release affects any surface water body, give the name of the water body.		
 If the release affects a stream, give the stream order or average flow rate, in cubic feet per second. stream order: or average flow rate: cubic feet/second; OR If the release affects a lake, give the surface area of the lake in acres and the average depth in meters. surface area of lake: acres and average depth of lake: meters. 		
O SOIL OR GROUND WATER If the release is on or under ground, indicate the distance to the closest water well.		
Optional Information		
The following information is not required in the final rule; however, such information will assist EPA in evaluating the risks associated with the continuous release. If this information is not provided, EPA will make conservative assumptions about the appropriate values. Please note that the units specified below are suggested units. You may use other units; however, be certain that the units are clearly identified.		
 For a stack release to air, provide the following information, if available: Inside diameter3 feet or meters Gas Exit Velocity unknown feet/second or meters/seconds For a release to surface water, provide the following information, if available:		

SOURCE INFORMATION (continued)	CR-ERNS Number	44607	
	SECTION II: SOURCE INFORMATION	(continued)	

Part C. Identity and Quantity of Each Hazardous Substance or Mixture Released From Each Source Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.

Plant 4 H2 Vent Stack, C-200 Name of Source:

Whenever there is a thist each hazardous substance released from the source identified above and provide the following information. (For an example, see Table 1 of startup. Does not correspond to a the Release Months of Reporting Requirements for Continuous Releases of Hazardous Substances – A Guide for Facilities and Vessels on Compliance.) Released in Previous Year Total Quantity (in lbs. or kg)* 2,000 Approx. 2 of Releases (per year) Lower Bound (in lbs. or kg per day)* Normal Range 0 Upper Bound 1,000 7664-41-7 CASRN# Name of Hazardous Substance Ammonia

particular month.

list each mixture released from the source identified above and provide the following information. (For an example, see Table 2 of Reporting Requirements for Continuous Releases of Hazardous Substances – ${
m A}$ Guide for Facilities and Vessels on Compliance.)

of Releases (per year) (in lbs. or kg per day)* Normal Range of Upper Lower
Bound Bound (in lbs. or kg per day)* Normal Range of Components Upper Lower Bound Bound Percentage Weight CASR\# Components Hazardous Substance Name of Name of Mixture

Release

Months of the

Total Quantity of Mixture Released in Previous Year (in lbs. or kg)

Number

N/A

Please be sure to include units where appropriate. Also, if the release is a radionuclide, units of curies (CI) are appropriate.

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	INFORMA	TION T		44607	
For vess	t A: Basis for Asserting the EACH source of a release el, provide the following in essary.	of a hazardous sub	stance or mixt	ure from your f	facility or
Na	me of Source: Plant 4 Steam	Knock-out Drum, H-2	60		
1.	Indicate whether the release from continuous without interruption		routine, anticipat	ed, intermittent	X
2.	Identify the activity(ies) that resu If malfunction, describe the malf continuous and stable in quantity	unction and explain why	is source (e.g., batc the release from th	ch process, filling of the malfunction shou	f a storage tank). ld be considered
	Operating Plant #1 while	Plant #4 is shut down.			
3	Identify below how you establish	ed the pattern of release :	and calculated relea	ice estimates	
	Past release data	Knowledge of the operations and rele	facility/vessel's		ering estimate
	AP-42 test	Best professional j	udgment	Other (e	explain)

SECTION II:

SOURCE

^{*} Note that unanticipated events, such as spills, pipe ruptures, equipment failures, emergency shutdowns, or accidents, do not qualify for reduced reporting under CERCLA section 103(f)(2). Unanticipated events are not incidental to normal operations and, by definition, are not continuous or anticipated, and are not sufficiently predictable or regular to be considered stable in quantity and rate.

SOURCE

INFORMATION

(continued)

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Name of Source: Plant 4 Steam Knock-out Drum, H-260
Part B: Specific Information on the Source For the source identified above, provide the following information. Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.
AFFECTED MEDIUM. Identify the environmental medium (i.e., air, surface water, soil, or ground water) that is affected by the release from this source. If your source releases hazardous substances to more than one medium (e.g., a wastepile releasing to air and ground water), treat the release to EACH medium as a separate source and complete Section II, Parts A, B, and C, of this format for EACH medium affected.
O AIR X (stack X or area) If the medium affected is air, please also specify whether the source is a stack or a ground-based area source.
 If identified source is a stack, indicate stack height:80 feet or meters; OR If identified source is an area source (e.g., waste pile, landfill, valves, tank vents, pump seals, fugitive emissions), indicate surface area: square feet or square meters.
SURFACE WATER (stream, lake, or other) If the release affects any surface water body, give the name of the water body.
 If the release affects a stream, give the stream order or average flow rate, in cubic feet per second. stream order: or average flow rate: cubic feet/second; OR If the release affects a lake, give the surface area of the lake in acres and the average depth in meters. surface area of lake: acres and average depth of lake: meters.
O SOIL OR GROUND WATER If the release is on or under ground, indicate the distance to the closest water well.

Optional Information

The following information is not required in the final rule; however, such information will assist EPA in evaluating the risks associated with the continuous release. If this information is not provided, EPA will make conservative assumptions about the appropriate values. Please note that the units specified below are suggested units. You may use other units; however, be certain that the units are clearly identified.

•	For a stack release to air, provide the following			
	information, if avai	lable:		
	Inside diameter	<u>~ 1.7</u>	feet or meters	
	Gas Exit Velocity	unknown	feet/second or	
		me	ters/seconds	
	Gas Temperature	<u>220</u> deg	rees Fahrenheit,	
	-	-Ke	lvin, or Celsius	

For a release to surface water, provide the following information, if available:

Average Velocity ______ feet/second of Surface Water

CR-ERNS Number 44607	
FORMATION	
SECTION II: SOURCE IN (continued)	

Part C. Identity and Quantity of Each Hazardous Substance or Mixture Released From Each Source Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.

Plant 4 Steam Knock-out Drum, H-260

Name of Source:

Whenever plant #4 is in turnaround. Does not correspond to a ist each hazardous substance released from the source identified above and provide the following information. (For an example, see Table 1 of particular month. the Release Months of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.) Released in Previous Year (186,000/yr once every 4 years) Total Quantity (in lbs. or kg)* 46,500 30 days every 4 of Releases (per year) Number years Lower Bound (in lbs. or kg per day)* 0 Normal Range Upper Bound 6,200 7664-41-7 CASRN# Name of Hazardous Substance Ammonia

list each mixture released from the source identified above and provide the following information. (For an example, see Table 2 of Reporting Requirements for Continuous Releases of Hazardous Substances – A Guide for Facilities and Vessels on Compliance.)

of Releases (per year) Number (in lbs. or kg per day)* Normal Range of Upper Lower Bound Bound Mixture (in lbs. or kg per day)* Normal Range of Upper Lower
Bound Bound Components Percentage Weight CASRN# Components Hazardous Substance Name of Name of Mixture

Release

Months of the

Total Quantity of Mixture Released in Previous Year (in 1bs. or kg)

N/A

Please be sure to include units where appropriate. Also, if the release is a radionuclide, units of curies (CI) are appropriate.



SECTION II: SOURCE INFORMATION

CR-ERNS Number

44607

Part A: Basis for Asserting the Release is Continuous and Stable in Quantity and Rate. For EACH source of a release of a hazardous substance or mixture from your facility or vessel, provide the following information on a SEPARATE sheet. Photocopy this page if necessary.

necessury.
Name of Source: Plant 4, Ammonia Drain Tank, F-287
1. Indicate whether the release from this source is either:
continuous without interruptionOR routine, anticipated, intermittentX
2. Identify the activity(ies) that results in the release from this source (e.g., batch process, filling of a storage tank). If malfunction, describe the malfunction and explain why the release from the malfunction should be considered continuous and stable in quantity and rate.*
The ammonia drain tank is used to collect ammonia and oil mixtures whenever pump maintenance work is required. Ammonia vapors from the tank are typically burned in the small flare system (B-502), however, due to safety concerns, these vapors must occasionally be vented to the atmosphere.
Ammonia venting to the atmosphere occurs only when the large flare (B-501) is activated. The large flare, since it pulls more of a vacuum than the small flare, causes the ammonia drain tank's vacuum breaker to lift, thus allowing oxygen into the flare system. To avoid this, the drain tank is isolated from the flare system and is vented to atmosphere whenever the large flare is in service. The drain tank is used less than once per week and is always emptied within 24 hours. Ammonia is vented from this source no more than 20 days per year.
3. Identify below how you established the pattern of release and calculated release estimates.
Past release data X Knowledge of the facility/vessel's X Engineering estimate operations and release history
AP-42 testBest professional judgmentOther (explain) Flow Measurement

^{*} Note that unanticipated events, such as spills, pipe ruptures, equipment failures, emergency shutdowns, or accidents, do not qualify for reduced reporting under CERCLA section 103(f)(2). Unanticipated events are not incidental to normal operations and, by definition, are not continuous or anticipated, and are not sufficiently predictable or regular to be considered stable in quantity and rate.

SOURCE

INFORMATION

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following information, if available:

Average Velocity ______ feet/second

of Surface Water

(c	ontinued)					_
Name of Source:	Plant 4, Ammonia Drai	in Tank,	F-287			
	ation on the Source above, provide the following copy this page if necessary.		nation. Ple	ease provide a	SEPARATE sheet	
affected by the release from twastepile releasing to air and	ntify the environmental media his source. If your source rel ground water), treat the relea of this format for EACH me	eases haz	ardous subst CH medium	ances to more t	than one medium (e.g.,	a
	X or area) If the m round-based area source.	edium aff	ected is air,	please also spec	cify whether the	
If identified source is a	stack, indicate stack height:	25	<u>: </u>	t or meters ; Ol	R	
1	m area source (e.g., waste pil rface area: square feet o			ık vents, pump :	seals, fugitive	
O SURFACE WATER	, (stream, lake	or otl	her			
If the release affects are	ny surface water body, give t	the name	of the water	body.		j
	stream, give the stream order	`	•	in cubic feet pe	er second.	
stream order: c	or average flow rate: cu	ubic feet/s	second; OR			
If the release affects a	lake, give the surface area of	the lake i	n acres and	the average dep	oth in meters.	
surface area of lake:	acres and average depth	of lake; _	meters			
O SOIL OR GROUND If the release is on or unde	WATER	e to the cl	osest water	well.	<u></u>	
						_
	Optional	Informa	ıtion			_ 1
evaluating the risks asso make conservative assu	on is not required in the final related with the continuous related mptions about the appropri	ease. If thiate value	his informa es. Please no	tion is not provote that the units	vided, EPA will s specified below are	7
For a stack release to the stack release to th	o air, provide the following	•	For a release	to surface water	, provide the	-

<u>unknown degrees Fahrenheit,</u> Gas Temperature -Kelvin, or Celsius

0.5

unknown_

feet or meters

feet/second or

meters/seconds

information, if available:

Inside diameter

Gas Exit Velocity

						5	CD TIDNIC N.	7.	
2	SECTION II: SOUR	SOURCE INFORMATION	MATION			֖֖֖֖֖֖֭֭֝֝֝֞֝֝ ֞	K-EKIND I	Number	
	(continued)	ned)					44607		
Part Plons	Part C. Identity and Quantity of Each Hazardous Substance or Mixture Released From Each Source Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.	ntity of Each	Hazardous	Substance or Mixture Released Fr ce. Photocopy this page if necessary.	Mixture Rel his page if n	eased From E	ach Soure	9 2	
					,	•			
Z	Name of Source:	Plant 4, Ammonia Drain Tank, F-287	ia Drain Tank	, F-287					
									,
	List each hazardous substance released from the source identified above and provide the following information. (For an example, see Table 1 of Reporting Requirements for Continuous Releases of Hazardous Substances – A Guide for Facilities and Vessels on Compliance.)	e released from Continuous Rele	the source iden sases of Hazard	ntified above and propertions Substances – A	rovide the follov A Guide for Fac	wing information. ilities and Vessels	(For an exact on Complia	ample, see Tab ınce.)	le 1 of
······································	Name of Hazardous Substance	CASRN#	Norm (in lbs. er Upper Bound	Normal Range (in lbs. o r kg per day)* r Bound <u>Lower Bound</u>	Number of Releases (per year)	Total Quantity Released in Previous Year (in lbs. er kg)*	ity ous Year <u>e)*</u>	Months of the Release	431
	Ammonia	7664-41-7	165	0	<20	3300		AII	
	List each mixture released from the source identified above and provide the following information. (For an example, see Table 2 of Reporting Requirements for Continuous Releases of Hazardous Substances – A Guide for Facilities and Vessels on Compliance.)	om the source id s Releases of Haz	entified above zardous Substa	and provide the folunces - A Guide for	llowing informa Facilities and	tion. (For an exa Vessels on Compli	mple, see Ta iance.)	ible 2 of Repor	ting
	Name of Mixture	S CASRN#	Weight Percentage	Normal Range of Components (in lbs. or kg per day)* Upper Lower Bound Bound	Normal Range of Mixture in lbs. or kg per day)* Upper Lower Bound Bound	nge of re per day)* Number wwer of Releases und (per year)		Total Quantity of Mixture Released in Previous Year (in lbs. or kg)	Months of the <u>Release</u>
	N/A								
*	Please be sure to include units where appropriate. Also, if the release is a radionuclide, units of curies (CI) are appropriate.	here appropriate.	Also, if the relea	tse is a radionuclide, 1	units of curies (C)) are appropriate.			

